



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 9, 2021

**BY ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)**

Dear Judge Nathan:

The Government respectfully seeks redactions to its letter motion for admission of Government Exhibit 52 (Dkt. No. 533), sealing of Exhibit A to that letter, and redactions to Exhibit B to that letter. The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although the Government's letter and exhibits are judicial documents subject to the common law presumption of access, the limited proposed redactions and sealing are narrowly tailored to protect the privacy interests of the Minor Victims and witnesses, including individuals who are subjects of the Court's pseudonym order, as well as third parties. The Government also notes that the redactions to Exhibit B conform to redactions of that document in *Giuffre v. Maxwell*, 15 Civ. 7433 (LAP).

By: \_\_\_\_\_ s/  
Maurene Comey  
Alison Moe  
Lara Pomerantz  
Andrew Rohrbach  
Assistant United States Attorneys  
Southern District of New York

Cc: Defense Counsel (By ECF)